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December 6, 2019

Docket Control  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

RE: Arizona Public Service Company (APS or Company)  
Rate Review and Examination of Books and Records of APS  
Docket No. E-01345A-19-0003

Commissioner Kennedy,

APS appreciates the opportunity to respond to your December 5 letter to APS President Jeff Guldner regarding the Rate Comparison Tool. Below are answers to your questions:

*QUESTION: Did APS, GridX, or any other party conduct tests, audits, and/or analyses of the accuracy of the rate comparison tool in advance of its initial release for use by the public?*

RESPONSE: Yes. APS performed testing and validation of the rate calculations, interval data, and file transfers associated with the Rate Comparison Tool prior to its release for use by the public.

*QUESTION: Did APS, GridX, or any other party conduct tests, audits, and/or analyses of the accuracy of the rate comparison tool for each new public iterations of the tool, or after any updates, fixes, changes made to the tool?*

RESPONSE: On February 4, APS implemented a new data management system affecting the data fed to the Rate Comparison Tool. At that time, APS performed testing and validation of the data file transfers to the Rate Comparison Tool. However, APS did not retest rate calculations or validate the time-of-use interval data at the time of the upgrade.

*QUESTION: If not, why not?*

RESPONSE: Please refer to the previous response.

*QUESTION: If yes, please provide all analyses, audit results, and other documentation related to the tool accuracy verification processes for all tool iterations.*

RESPONSE: APS is working to compile a description of the testing performed and the supporting documentation and will provide this information to the Commission no later than December 10, 2019. We also look forward to answering questions from the Commission at the December 11 Open Meeting.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rodney J. Ross".

Rodney J. Ross

RR/eml